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7 IN THE UNITED STATES DISTRICT COURT
8
9 EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,

CASE NO. 2:24-CR-00202-DJC

11 Plaintiff,

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

12 v.

13 JESUS AGUILAR-MENDOZA,

DATE: August 22, 2024

14 Defendant.

TIME: 9:00 a.m.

COURT: Daniel J. Calabretta

15
16 STIPULATION

17 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
18 through defendant's counsel of record, hereby stipulate as follows:

19 1. By previous order, this matter was set for status on August 22, 2024.

20 2. By this stipulation, defendant now moves to continue the status conference until
November 21, 2024, at 9:00 a.m., and to exclude time between August 22, 2024, and November 21,
22 2024, under Local Code T4.

23 3. The parties agree and stipulate, and request that the Court find the following:

24 a) The government has represented that the discovery associated with this case
includes investigative reports and related documents exceeding 1000 pages of documents. All of
25 this discovery is in the process of being produced directly to counsel and/or made available for
26 inspection and copying.

27 b) Counsel for defendant desires additional time to consult with his client, review the

1 current charges, conduct investigation and research related to the charge, review and copy
2 discovery for this matter, discuss potential resolutions with his client, and otherwise prepare for
3 trial.

4 c) Counsel for defendant believes that failure to grant the above-requested
5 continuance would deny him/her the reasonable time necessary for effective preparation, taking
6 into account the exercise of due diligence.

7 d) The government does not object to the continuance.

8 e) Based on the above-stated findings, the ends of justice served by continuing the
9 case as requested outweigh the interest of the public and the defendant in a trial within the
10 original date prescribed by the Speedy Trial Act.

11 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
12 et seq., within which trial must commence, the time period of August 22, 2024 to November 21,
13 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
14 T4] because it results from a continuance granted by the Court at defendant's request on the basis
15 of the Court's finding that the ends of justice served by taking such action outweigh the best
16 interest of the public and the defendant in a speedy trial.

17 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
18 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
19 must commence.

20 IT IS SO STIPULATED.

21
22 Dated: August 19, 2024

PHILLIP A. TALBERT
United States Attorney

23
24 /s/ ZULKAR KHAN
ZULKAR KHAN
25 Assistant United States Attorney
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1 Dated: August 19, 2024

/s/ Hootan Baigmohammadi

2 Hootan Baigmohammadi
Counsel for Defendant
3 Jesus Aguilar-Mendoza

5 **ORDER**

6 IT IS SO FOUND AND ORDERED this 20th day of August, 2024.

8 /s/ Daniel J. Calabretta

9 THE HONORABLE DANIEL J. CALABRETTA
10 UNITED STATES DISTRICT JUDGE